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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

VALERIE GEORGE, as Administrator and  
Personal Representative of THE ESTATE OF  
RYAN GEORGE; VALERIE GEORGE and/or  
TAJMAH BEAUCHAMP, as Legal  
Representative(s) for Jaida George and Ryan  
George, Jr.; VALERIE GEORGE, Individually;  
DONALD GEORGE; and TAJMAH  
BEAUCHAMP, Individually,

Plaintiffs,

vs.

SONOMA COUNTY SHERIFF'S  
DEPARTMENT; BILL COGBILL; COUNTY  
OF SONOMA; CALIFORNIA FORENSIC  
MEDICAL GROUP, INC; JAMES LUDERS,  
M.D.; MICHAEL E. DAGEY, R.N.; SUTTER  
HEALTH; SUTTER MEDICAL CENTER OF  
SANTA ROSA; EDWARD W. HARD, M.D.;  
RICHARD FLINDERS, M.D.; JOSEPH N.  
MATEL, M.D.; NORICK JANIAN, M.D.;  
ANGUS MATHESON, M.D., and DOES 1  
through 25, inclusive,

Defendants.

Case No. 3:08-cv-02675-EDL

ECF Case

**STIPULATION AND ~~[PROPOSED]~~  
ORDER RE DEFENDANTS RICHARD  
FLINDERS, M.D.'S, AND JOSEPH N.  
MATEL, M.D.'S MOTION TO DISMISS  
AND NORICK JANIAN, M.D.'S  
MOTION TO JOIN**

**JURY TRIAL DEMANDED**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned  
counsel for all parties, that subject to the Court's approval:

- (i) Plaintiffs Valerie George, Donald George, and Tajmah Beauchamp voluntarily dismiss with prejudice their individual causes of action for negligent and intentional infliction of emotional distress (the eighteenth and nineteenth causes of action) against Defendants Richard Flinders, M.D., Joseph N. Matel, M.D., and Norick Janian, M.D.
- (ii) Defendants Richard Flinders, M.D. and Joseph N. Matel, M.D. hereby withdraw their pending Motion to Dismiss and Motion to Strike. Defendants Flinders' and Matel's Answers to Plaintiffs' Third Amended Complaint shall be due on or before April 24, 2009.
- (iii) Defendant Norick Janian, M.D. hereby withdraws his pending Motion to Join in Defendants Flinders' and Matel's Motion to Dismiss and Motion to Strike.

**SO STIPULATED.**

DATED: April 7, 2009

ROGASKI PREVOLOS WEBER &amp; PATTERSON

By: /s/ Chester Rogaski

241 Georgia Street  
Vallejo, CA 94590  
*Attorneys for Defendant Norick Janian, M.D.*

DATED: April 7, 2009

HASSARD BONNINGTON LLP

By: /s/  
Joanna Storey

Two Embarcadero Center, Suite 1800  
San Francisco, CA 94111  
*Attorneys for Defendants Richard Flinders,  
M.D. and Joseph N. Matel, M.D.*

DATED: April 7, 2009

SANFORD WITTELS & HEISLER, LLP

By: /s/ Thomas Marc Litton  
Thomas Marc Litton (CA Bar # 119985)

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(admitted pro hac vice)

*Attorneys for Plaintiffs*

April 8, 2009

SO ORDERED: \_\_\_\_\_

